

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington DC 20554

In the Matter of )  
 )  
 Reexamination of the Comparative Standards for ) MM Docket No. 95-31  
 Noncommercial Educations Applicants )

## To the Commission

## Comments of Minnesota Public Radio

Minnesota Public Radio ("MPR") hereby files these comments in response to the Federal Communications Commission ("FCC") public notice seeking comment on procedures that will govern the upcoming noncommercial FM application window. MPR operates a 37-station radio network serving virtually all of Minnesota and parts of surrounding states and produces programming for radio, Internet and face-to-face audiences. Programs produced by Minnesota Public Radio, operating as American Public Media,<sup>TM</sup> reach 14.6 million listeners nationwide each week. Of those, more than 800,000 listen regionally, in Minnesota and surrounding states.

MPR is affiliated with Southern California Public Radio, a non-profit entity, through a common parent support organization. Thus, applications by MPR and SCPR would collectively be limited to whatever maximum number of applications that is imposed in the NCE filing window.

MPR fully supports the imposition of an application limit to deter the filing of speculative applications and to permit the expeditious processing of the applications filed during the filing window. However, MPR believes the 10 application limit is too low. The pent-up demand for new NCE facilities, along with the freeze on new NCE station applications for the past seven years, means that the October NCE filing window will provide an extremely important opportunity for public radio licensees, many of whom have limited resources, to upgrade their translator stations to full power stations and to increase the substantial public service they provide to their listeners.

Thus, MPR proposes a modest increase in the number of permissible applications – from 10 to 30. This would increase the prospects for obtaining construction permits without opening the door to the mass filing of speculative applications. Accordingly, MPR submits that a 30 application filing limit would better serve the public interest and we urge the Commission to adopt such a limit.

For the foregoing reasons, MPR supports the imposition of a filing limit but asks the Commission to increase the number of applications any one entity may file in the October filing window from 10 to 30 applications.

Respectfully submitted,

Minnesota Public Radio

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